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5 Attorneys for MIDLAND FUNDING, LLC;
MIDLAND CREDIT MANAGEMENT, INC.;
6 and ENCORE CAPITAL GROUP, INC.

7
8 **UNITED STATES DISTRICT COURT**
9 **SOUTHERN DISTRICT OF CALIFORNIA**

10
11 JIMMI BROWN,
12 Plaintiff,

13 v.

14 MIDLAND FUNDING, LLC; MIDLAND
CREDIT MANAGEMENT, INC.; AND
15 ENCORE CAPITAL GROUP, INC.,
16 Defendants.

CASE NO. 3:11-CV-02538 L (BGS)

Complaint Filed: October 31, 2011

**DEFENDANTS' RULE 68 OFFER OF
JUDGMENT**

17
18 With no admission of liability, and for the purpose of compromising all disputes between,
19 on the one hand, Plaintiff JIMMI BROWN ("Plaintiff") and, on the other hand, Defendants
20 MIDLAND FUNDING, LLC, MIDLAND CREDIT MANAGEMENT, INC. and ENCORE
21 CAPITAL GROUP, INC. (collectively "Defendants"), Defendants hereby offer to allow entry of
22 judgment, pursuant to Rule 68 of the Federal Rules of Civil Procedure on the following terms:

23 1. Judgment for Plaintiff against Defendants in the total sum of \$1,001.00, plus
24 reasonable attorneys' fees incurred and costs accrued to the date of this offer as determined by the
25 Court; and

26 2. Defendants shall forgive the debt Plaintiff owes Defendants pursuant to
27 Defendants' account no. 8537845148 (the "Debt") and delete all trade lines associated with the
28 Debt.

1 Pursuant to Federal Rule of Civil Procedure 68, this offer must be accepted within fourteen
2 (14) days of service, and is thereafter withdrawn.

3
4 DATED: March 30, 2012

SOLOMON WARD SEIDENWURM & SMITH, LLP

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6 By: 

THOMAS F. LANDERS
Attorneys for MIDLAND FUNDING, LLC;
MIDLAND CREDIT MANAGEMENT, INC.;
AND ENCORE CAPITAL GROUP, INC.

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10 The above Rule 68 offer of judgment is hereby accepted.

11
12 DATED: 4/4/12

KIMMEL & SILVERMAN

13
14
15 By: 

AMY L. BENECOFF BENECOFF
Attorneys for Plaintiff JIMMI BROWN

CERTIFICATE OF SERVICE

I am over the age of 18 years and not a party to this action. My business address is 30 E. Butler Avenue, Ambler, PA, 19002. On April 4, 2012, I electronically filed DEFENDANT'S RULE 68 OFFER OF JUDGMENT (WITH ACCEPTANCE) with the clerk of the Court using the CM/ECF system which will send notification of such filing to the following email addresses:

Thomas F Landers, Esq.
Solomon Ward Seidenwurm & Smith, LLP
401 B Street, Suite 1200
San Diego, CA 92101
Email: tlanders@swsslaw.com

Executed on April 4, 2012 at Ambler, Pennsylvania.

Kimmel & Silverman, P.C.

/s/ Amy L. Bennecoff
Attorney for the Plaintiff
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